

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:20CR424
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
v.)	
)	
MARGARET COLE,)	<u>PROTECTIVE ORDER</u>
DEBRA PARRIS,)	
DORAH MIREMBE,)	
)	
Defendants.)	

Upon joint motion of the United States, Defendant Margaret Cole, and Defendant Debra Parris, and for good cause shown, the Court hereby issues this Protective Order applicable to discovery disclosures in the above-captioned case:

1. All documents and electronically-stored information disclosed by the United States to Defendants Margaret Cole and Debra Parris (“Discovery Material”) shall be used solely for the purpose of conducting pretrial, trial, and appellate proceedings in this action and for no other purpose.
2. In no event will Defendants Margaret Cole and Debra Parris, or their counsels of record, disclose, directly or indirectly, Discovery Material or the substance thereof to anyone, including the media, except as provided herein.
3. Only the Defendants Margaret Cole and Debra Parris, their counsel of record, designated defense team members,¹ or potential witnesses may view the Discovery

¹ “Defense Team” shall mean: the defendants and their counsel of record in this case; employees of defense counsel and their associated law firms, if any; and other individuals engaged or employed by defense counsel of record in connection with this case, including expert witnesses.

Material, which is to remain in the sole custody of counsel for Defendants Margaret Cole and Debra Parris or their designated agents at all times.

4. Prior to disclosure of the Discovery Material to a potential witness, counsel for Defendants Margaret Cole and Debra Parris must redact any personal identifying information.² Redaction is not required if the personal identifying information belongs to the witness to whom the Discovery Material is disclosed.
 - a. Prior to the actual disclosure to a potential witness, counsel for Defendants Margaret Cole and Debra Parris must read or summarize the pertinent parts of this Order to the witness or provide a copy of this Order to the witness, and orally advise the witness of his or her obligation to comply with its terms.
 - b. The witness to whom disclosure is made shall not retain Discovery Materials or any copies thereof.
5. Nothing in this Order shall operate or be construed to operate as restricting the Defendants' rights to meaningful communication with their defense counsel or to abrogate the United States' duty to provide exculpatory evidence to Defendants.
6. Nothing in this Order shall prevent the United States or Counsel for Defendants from using Discovery Material in connection with any hearings or pleadings or motions filed in this case, provided that such material is properly redacted or, if such redaction cannot be readily accomplished, filed under seal.

² Personal identifying information includes the name, social security number, national identification number, date of birth, physical address, telephone number, email address, IP address, vehicle license plate number, Vehicle Identification Number, driver's license or other identification card number, fingerprints, handwriting, credit or debit card number, financial account number, birthplace, and/or genetic information of any individual.

7. Leave to deviate from the conditions of this Order must be requested from the Court in writing.
8. Failure to comply with the terms of this Order is punishable by contempt of court or by whatever other sanction deemed the Court shall deem just.

This Order will remain in effect until further order of the Court.

IT IS SO ORDERED.

s/Christopher A. Boyko
CHRISTOPHER A. BOYKO
UNITED STATES DISTRICT JUDGE

DATE: October 1, 2020